

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,	:	
	:	
v.	:	
	:	Criminal No.: 1:17-CR-00106-CCB-5
KENTON GONDO, <i>et al.</i> ,	:	
	:	
<u>JEMELL LAMAR RAYAM</u>	:	
	:	
<i>Defendant.</i>	:	

**DEFENDANT JEMELL LAMAR RAYAM'S MOTION TO CONTINUE**

And now comes Defendant Jemell Lamar Rayam ("Mr. Rayam"), by and through undersigned counsel, and respectfully requests this Court to continue the Sentencing Hearing currently scheduled for March 8, 2019, and in support thereof avers as follows:

1. On February 23, 2017, a grand jury for the District of Maryland returned an Indictment alleging several violations of the Racketeering Act, 18 U.S.C. §§ 1961-1968.
2. On October 10, 2017, Mr. Rayam pleaded guilty to one count of racketeering conspiracy, in violation of 18 U.S.C. § 1962(d).
3. Mr. Rayam is currently detained at the Kent County Detention Center, in Chestertown, Maryland.
4. A sentencing hearing is currently scheduled for March 8, 2019.
5. As of the date of the filing of this Motion, a pre-sentence report has not been issued.
6. Undersigned counsel will require time to review the pre-sentence report yet to be issued. Under the Rules, undersigned counsel and Mr. Rayam have 14 days to review and respond to the pre-sentence report. There is insufficient time to comply with the Rule.

7. Also, undersigned counsel will need time to meet with Mr. Rayam and note any objections to the report, and prepare and file a sentencing memorandum.

8. Mr. Rayam's Sentencing Memorandum is due tomorrow, February 22, 2019. The Sentencing Memorandum cannot be prepared until after the pre-sentence report has been reviewed since it is not possible to determine what, if any, issues are raised by the pre-sentence report.

9. Neither party will be prejudiced by a short delay in sentencing.

**WHEREFORE**, based upon the foregoing, Defendant Jemell L. Rayam respectfully requests this Court to continue the Sentencing Hearing currently scheduled for March 8, 2019.

/s/ Dennis E. Boyle

Dennis E. Boyle, Esquire  
Whiteford Taylor & Preston LLP  
1800 M Street, NW, Suite 450 N  
Washington, D.C., 20036

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21 day of February 2019, I electronically filed the foregoing with the Court using the CM/ECF system, which sent notification of such filing to the following persons at the following email address:

Leo J. Wise, Assistant U.S. Attorney  
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/s/Dennis E. Boyle  
Dennis E. Boyle